

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
LEMKO CORPORATION, XIAOHONG)	
SHENG, SHAOWEI PAN, HANJUAN JIN,)	
XIAOHUA WU, XUEFENG BAI,)	
NICHOLAS LABUN, BOHDAN PYSKIR,)	
HECHUN CAI, JINZHONG ZHANG,)	
ANGEL FAVILA, ANKUR SAXENA,)	Case No. 08 CV 5427
RAYMOND HOWELL, FAYE VORICK,)	
and NICHOLAS DESAI,)	
)	
)	
)	
Defendants.)	Judge Matthew F. Kennelly
)	
* * * * *)	Magistrate Judge Geraldine Soat Brown
LEMKO CORPORATION, SHAOWEI PAN,)	
XIAOHUA WU and XIAOHONG SHENG,)	
)	
Counter-Plaintiffs,)	
)	
v.)	
MOTOROLA, INC.,)	
)	
Counter-Defendant.)	

**NOTICE OF MOTOROLA INC.'S MOTION TO SEEK LEAVE TO AMEND ITS
LOCAL RULE 56.1(b)(3) RESPONSE TO DEFENDANTS LEMKO CORPORATION'S,
SHAOWEI PAN'S, AND NICHOLAS LABUN'S STATEMENT OF UNDISPUTED
FACTS IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT ON
MOTOROLA'S DECLARATORY JUDGMENT CLAIM FOR PATENT OWNERSHIP**

PLEASE TAKE NOTICE that on Tuesday, September 20, 2011 at 9:30 a.m., or as soon thereafter as counsel may be heard, counsel for Plaintiff Motorola, Inc. (n/k/a Motorola Solutions, Inc.) will appear before the Honorable Matthew F. Kennelly in the courtroom usually

occupied by him, Room 2103 of the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, and present MOTOROLA, INC.'S MOTION TO SEEK LEAVE TO AMEND ITS LOCAL RULE 56.1(b)(3) RESPONSE TO DEFENDANTS LEMKO CORPORATION'S, SHAOWEI PAN'S, AND NICHOLAS LABUN'S STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT ON MOTOROLA'S DECLARATORY JUDGMENT CLAIM FOR PATENT OWNERSHIP, a copy of which has been served via the Court's electronic filing system upon all counsel of record.

Date: September 15, 2011

Respectfully submitted,

By: /s/ Maureen L. Rurka

R. Mark Halligan
Deanna R. Swits
Jason T. Kunze
NIXON PEABODY LLP
300 South Riverside Plaza, 16th Floor
Chicago, Illinois 60606
T: (312) 425-3900
F: (312) 425-3909

Dan K. Webb
Lawrence R. Desideri
Maureen L. Rurka
J. Ethan McComb
Joanna R. Travalini
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, Illinois 60601
T: (312) 558-5600
F: (312) 558-5700

Attorneys for Plaintiff Motorola, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing NOTICE OF MOTION was filed electronically in compliance with the General Order on Electronic Case Filing, Section III(B)(1). As such, these documents were served on all counsel who are deemed to have consented to electronic service. Fed. R. Civ. P. 5(b)(2)(D) and Local Rule 5.9.

Date: September 15, 2011

/s/ Maureen L. Rurka

Attorney for Plaintiff Motorola, Inc.